

1 EDMUND G. BROWN JR., Attorney General
of the State of California
2 ARTHUR TAGGART
Supervising Deputy Attorney General
3 STERLING A. SMITH, State Bar No. 84287
Deputy Attorney General
4 California Department of Justice
1300 I Street, Suite 125
5 P.O. Box 944255
Sacramento, CA 94244-2550
6 Telephone: (916) 445-0378
Facsimile: (916) 327-8643

7 Attorneys for Complainant
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10 **BEFORE THE**
BOARD OF REGISTERED NURSING
11 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

12 In the Matter of the Accusation Against:

Case No. 2008-121

13 **SANDRA LYNN JONES**
14 7820 Pomeroy Way
Citrus Heights, California 95610

A C C U S A T I O N

15 Registered Nurse License No. 612359

16 Respondent.
17

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19 Ruth Ann Terry, M.P.H., R.N. ("Complainant") alleges:

20 **PARTIES**

21 1. Complainant brings this Accusation solely in her official capacity as the
22 Executive Officer of the Board of Registered Nursing ("Board"), Department of Consumer
23 Affairs.

24 2. On or about January 27, 2003, the Board issued Registered Nurse License
25 Number 612359 to Sandra Lynn Jones ("Respondent"). The license will expire on
26 October 31, 2008, unless renewed.

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4. Code section 2761 states, in part:

"The board may take disciplinary action against a certified or licensed nurse or deny an application for a certificate or license for any of the following:

REGULATORY PROVISIONS

COST RECOVERY

FIRST CAUSE FOR DISCIPLINE

7. Respondent is subject to discipline under Code section 2761(a)(1), on the grounds of unprofessional conduct in that between March 2003 and May 2003, while employed as a registered nurse at Eskaton Home Care Services, Fair Oaks, California, Respondent demonstrated incompetence in the following respects:

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1 **Patient MacG**

2 a. Respondent failed to submit the required patient paperwork in a timely manner,
3 in that it was late in excess of a week for approximately one month.

4 b. Respondent failed to perform a physician ordered blood draw on
5 March 1, 2003; instead, it was performed on March 3, 2003, without notification to the physician
6 of the delay.

7 c. Respondent failed to report the results of a blood draw performed on
8 March 5, 2003, to University of California, Davis Medical Center ("UCD").

9 d. Respondent performed blood draws on March 7, 12, 13, 27, and 31, 2003,
10 without an order from UCD.

11 e. Respondent documented 11 ProTime/International Normalized Ratio
12 ("PT/INR") results in the nursing notes with an entry that states, "Call to UCD Coumadin
13 Clinic"; however, there is no documentation of such results on the UCD log.

14 f. Respondent failed to visit/perform weekly PT/INR blood testing as ordered by
15 the patient's physician.

16 g. Respondent documented visiting the patient on April 23, 2003, when, in fact,
17 Respondent did not make such a visit.

18 h. Respondent performed a PT/INR blood test on April 29, 2003, instead of
19 April 30, 2003, as prescribed by the physician.

20 i. On or about April 30, 2003, without a physician's order, Respondent instructed
21 the patient to reduce her medication (Coumadin) dose from 6 mg. to 3 mg.

22 **Patient L.S.**

23 j. On or about April 15, 2003, without a physician's order, Respondent instructed
24 the patient to stop taking her medication (Coumadin) until further notice.

25 k. Respondent failed to document the necessity of a follow-up visit regarding
26 symptomatic issues (vomiting and sugar levels) the patient was experiencing during
27 Respondent's visit on April 15, 2003.

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1 **Unknown patient**

2 1. On or about May 2, 2003, Respondent failed to properly insert a urinary
3 catheter in the patient.

4 **SECOND CAUSE FOR DISCIPLINE**

5 **(Unprofessional Conduct)**


6 8. Respondent is subject to discipline under Code section 2761(a) on the
7 grounds of unprofessional conduct in that between March 2003 and May 2003, while employed
8 as a registered nurse at Eskaton Home Care Services, Fair Oaks, California, Respondent was
9 guilty of unprofessional conduct, as more particularly set forth above in paragraph 7.

10 **PRAYER**

11 **WHEREFORE**, Complainant requests that a hearing be held on the matters
12 herein alleged, and that following the hearing, the Board of Registered Nursing issue a decision:

- 13 1. Revoking or suspending Registered Nurse License Number 612359 to
14 Sandra Lynn Jones;
- 15 2. Ordering Sandra Lynn Jones to pay the Board of Registered Nursing the
16 reasonable costs of the investigation and enforcement of this case, pursuant to Business and
17 Professions Code section 125.3; and,
- 18 3. Taking such other and further action as deemed necessary and proper.

19 DATED: 10/5/07

20 
21 RUTH ANN TERRY, M.P.H., R.N.
22 Executive Officer
23 Board of Registered Nursing
24 Department of Consumer Affairs
25 State of California
26 Complainant
27
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SA2006100794
Accusation (kdg) 9/27/07